

**From:** Taylor, Triscilla [mailto:Triscilla.Taylor@bp.com]  
**Sent:** Monday, January 30, 2006 4:09 PM  
**To:** Gebhardt, Sharron  
**Subject:** BP Comments on RIN 1010-AC29

Ms. Gebhardt,

Attached is a copy of BP's comments on RIN 1010-AC29 "Reporting and Paying Royalties on Federal Leases on Takes or Entitlements Basis." Please send receipt confirmation to either the email or office address listed below .

Thank you,  
Triscilla P. Taylor  
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Production Tax and Royalty Center  
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<<BPCommentsRIN1010-AC29.pdf>>

1/31/2006



**BP America Inc.**  
Production Tax and Royalty Center  
501 Westlake Park Boulevard  
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Houston, TX 77079

January 30, 2005

Ms. Sharron L. Gebhardt  
Minerals Management Service  
Minerals Revenue Management  
Post Office Box 25165  
Denver, Colorado 80225-0165

ATTN: RIN 1010-AC29 – Takes vs. Entitlements

Dear Ms. Gebhardt:

BP thanks the Minerals Management Service for the opportunity to comment on the advance notice of proposed rulemaking for "Reporting and Paying Royalties on Federal Leases on Takes or Entitlements Basis." The notice solicits comments and suggestions from interested parties to assist the Minerals Management Service in developing the proposed "takes vs. entitlements" regulations when oil and gas production is commingled upstream of the point of royalty measurement.

BP has reviewed the notice internally and has discussed the impact of the proposed rulemaking with other members of the Council of Petroleum Accountants Societies ("COPAS"). BP is in receipt of COPAS' January 26, 2006 comments regarding the proposed rulemaking. BP finds that its comments mirror those of COPAS. Therefore, BP will not provide comments in addition to those previously provided by COPAS. Instead, BP offers this letter as an endorsement of COPAS' January 26 comments on this matter.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Triscilla P. Taylor".

Triscilla P. Taylor  
Royalty Counselor